

U.S. DISTRICT COURT  
DISTRICT OF MAINE  
PORTLAND  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

MAR 20 2024

UNITED STATES OF AMERICA

v.

ADEN MOHAMED,  
a/k/a "AD", a/k/a "Mike"

No. 2:24-cr-00034-JAW

CHRISTA K. BERRY, CLERK

BY \_\_\_\_\_  
DEPUTY CLERK

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**  
**(Conspiracy to Violate Federal Firearms Laws)**

**THE CONSPIRACY AND ITS OBJECTS**

1. Beginning in about late 2020, and continuing until at least about August 2022, in the District of Maine and elsewhere, the defendant,

**ADEN MOHAMED**, a/k/a "AD", a/k/a "Mike,"

and another known individual, knowingly and intentionally conspired with each other and with others known and unknown to commit offenses against the United States, specifically, (1) knowingly making false statements or representations with respect to information required to be kept by a federal firearms licensee in violation of Title 18, United States Code, Section 924(a)(1)(A); and (2) knowingly making a false oral or written statement, intended or likely to deceive a federal firearms licensee in violation of Title 18, United States Code, Section 922(a)(6).

**MANNER AND MEANS OF THE CONSPIRACY**

2. It was a part and object of the conspiracy that Defendant's co-conspirators, at the direction of Defendant and with money provided by him, purchased firearms from federal firearms licensees in southern Maine intending to turn the purchased firearms

over to Defendant.

3. It was a part and object of the conspiracy that Cooperating Defendant-2 (“CD-2”) made false statements in connection with the acquisition, or attempted acquisition, of firearms from licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, which statements were intended and likely to deceive the licensed dealers of firearms, as to a fact material to the lawfulness of the sale of each of the respective firearms, including false statements and representations in forms that licensed dealers of firearms were required to keep.

OVERT ACTS

4. During the course of the conspiracy the following firearms were obtained by Defendant through CD-2 in the manner described in paragraphs 2 and 3, above.

	<b>Firearm</b>	<b>Date of Acquisition</b>	<b>Federal Firearms Licensee</b>
<b>1</b>	Glock Model 23 Gen 5, .40 caliber pistol BXHP151	June 29, 2022	Northeastern Firearms LLC, Turner, Maine
<b>2</b>	Glock Model 26 Gen 5, 9mm pistol AFYU261	June 30, 2022	Northeastern Firearms LLC, Turner, Maine
<b>3</b>	Glock Model 30S, .45 caliber pistol BXHV337	June 30, 2022	Kittery Trading Post, Kittery, Maine
<b>4</b>	Glock Model 23 Gen 3, .40 caliber pistol BXDK781	August 11, 2022	G3 Firearms, Turner, Maine

5	Glock Model 27 Gen 5, .40 caliber pistol BXMU247	August 11, 2022	G3 Firearms, Turner, Maine
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5. For each of the firearms listed above, CD-2 made false statements in connection with the purchase of the respective firearm. For example, CD-2 answered “yes” to question 11a on ATF Form 4473 which asks “[A]re you the actual buyer/transferee of the firearm listed on this form?” In fact, CD-2 did not intend to keep either firearm for him/herself and intended to give the firearms purchased to Defendant after the sale.

6. For each of the firearms listed above, CD-2, at the direction of Defendant, purchased the respective firearm from the federal firearms licensee and gave the firearm to the Defendant on the day of the sale.

7. For each of the firearms listed above, CD-2 was compensated by Defendant with cash or drugs.

In this way, the defendant violated Title 18, United States Code, Section 371.

**COUNT TWO**  
**(False Statements During the Purchase of Firearms)**

8. On about August 11, 2022, within the district of Maine, the defendant,

**ADEN MOHAMED**, a/k/a “AD”, a/k/a “Mike,”

aided, abetted, counseled, commanded, and induced CD-2 to knowingly make false statements and representations to G3 Firearms, LLC, an FFL licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the FFL’s records. Specifically, CD-2 executed Department of Justice, Bureau of Alcohol,



Tobacco, Firearms, and Explosives Forms 4473, Firearms Transaction Records, falsely in connection with CD-2's purchase of the following firearms from G3 Firearms in Turner, Maine: (1) a Glock Model 23 Gen 3, .40 caliber pistol bearing serial number BXDK781, and (2) a Glock Model 27 Gen 5, .40 caliber pistol bearing serial number BXMU247. On the Form 4473, CD-2 misrepresented as true, correct, and complete in Section B, Box 21.a, that CD-2 was the actual transferee/buyer of the firearms, and was not buying them on behalf of another person, when in fact, CD-2 purchased the firearms at the direction of, and with funds provided by, MOHAMED.

In this way, the defendant violated Title 18, United States Code, Section 922(a)(6) and 2.

**COUNT THREE**  
**(Conspiracy to Distribute Controlled Substances)**

9. Beginning in about July 2022, and continuing through at least July 2023, within the district of Maine and elsewhere, the defendant,

**ADEN MOHAMED**, a/k/a "AD", a/k/a "Mike,"

knowingly and intentionally conspired with others, both known and unknown, to distribute and possess with intent to distribute controlled substances, including a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers.

In this way, the defendant violated Title 21, United States Code, Sections 846 and 841(a)(1).

**FORFEITURE ALLEGATION**

10. Upon conviction of the firearms offenses charged in Counts One and Two of this Indictment, the defendant,

**ADEN MOHAMED**, a/k/a “AD”, a/k/a “Mike,”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved or used in the knowing commission of the offense, including but not limited to, a Glock Model 23 Gen 3, .40 caliber pistol bearing serial number BXDK781; a Glock model 19, 9 mm pistol, serial number BVGW528; and a Polymer80, model PF940C, 9 mm pistol, no serial number.

11. If any of the property described in Paragraph 10, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant -

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in above.

All pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

A TRUE BILL.

  
Assistant United States Attorney

Date: MARCH 20, 2024

Signature Redacted – Original on file  
with the Clerk's Office